

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JESSICA LABRIE, an individual,

Plaintiff,

vs.

COURTNEY LOVE COBAIN,

Defendant.

Case No. 1:13-cv-01833-AJN

Hon Alison J. Nathan

**NOTICE OF MOTION OF FREUNDLICH LAW TO WITHDRAW AS COUNSEL
FOR DEFENDANT COURTNEY LOVE COBAIN
AND STAY PROCEEDINGS**

TO: Defendant Courtney Love Cobain
c/o Steven Pines
2001 Wilshire Blvd, Ste 250
Santa Monica, CA 90403

Defendant

-and-

Plaintiff Jessica Labrie
c/o Joshua D. Gruenberg, Esq.
Susan M. Swan, Esq.
Law Office of Joshua D. Gruenberg
2169 First Avenue
San Diego, CA 92010

Attorneys for Plaintiff

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of Kenneth D.

Freundlich in Support of Motion to Withdraw as Counsel and Stay Proceedings, dated

October 23, 2013, and upon all prior pleadings and proceedings had herein, Freundlich Law

hereby moves this court, Honorable Alison J. Nathan presiding, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 906, New York, N.Y. 10007 for an order for the following relief:

- (a) Pursuant to Local Civil Rule 1.4 for leave to withdraw as counsel of record for Defendant Courtney Love Cobain; and
- (b) For a stay of these proceedings until such time as Defendant retains substitute counsel; and
- (c) Such other and further relief as may be just and proper in the circumstances.

PLEASE TAKE FURTHER NOTICE THAT, the Motion is made on the grounds that there has been a complete breakdown in the attorney-client relationship and irreconcilable differences exist between Defendant and her counsel that has rendered it impossible for counsel to effectively represent Defendant in this matter. The Motion is based on this Notice, the accompanying Declaration of Kenneth D. Freundlich, Esq., all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at the time of any hearing hereon.

DATED: October 23, 2013

FREUNDLICH LAW



Kenneth D. Freundlich
Attorney for Defendant Courtney Love
Cobain

CERTIFICATE OF SERVICE

I, Kenneth D. Freundlich, hereby certify that a copy of the foregoing Notice of Motion to Withdraw as Counsel of Record, and the annexed declaration of Kenneth D. Freundlich in Support of the Motion, were served upon all parties of record by the Electronic Case Filing system, and was mailed overnight to Defendant Courtney Love Cobain at her home address (which is confidential) and at the address of her business manager set forth in the Notice of Motion.

Dated: October 23, 2013



Kenneth D. Freundlich (KF 9831)

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*Counsel for Defendant Courtney Love
Cobain*